

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

**BMG RIGHTS MANAGEMENT
(US) LLC, and ROUND HILL
MUSIC LP**

Plaintiffs,

V.

Case No. 1:14-cv-1611(LO/JFA)

**COX COMMUNICATIONS, INC.,
COXCOM, LLC**

Defendants.

**PLAINTIFFS' MOTION *IN LIMINE* NO. 1 TO EXCLUDE INTRODUCTION OF
IRRELEVANT INFORMATION ABOUT RIGHTSCORP, INC.**

Pursuant to Federal Rules of Evidence 402 and 403, BMG Rights Management (US) LLC and Round Hill Music LP (“Plaintiffs”) hereby move for an order to exclude Cox Communications, Inc. and CoxCom LLC (collectively, “Cox”) from introducing irrelevant information about Rightscorp, including, but not limited to, (1) any use of derogatory terms like “troll” or “extortionist” in reference to Rightscorp or Plaintiffs; (2) evidence concerning Rightscorp’s business practices after 2011, including evidence concerning Rightscorp’s telephone agents, Rightscorp’s phone script, or any Rightscorp call recordings; (3) Rightscorp’s finances; and (4) any allegations that Rightscorp violated debt collection or private investigation licensing laws or engaged in the unlicensed practice of law. An accompanying memorandum of law has been filed in support of this motion.

For the reasons set forth in the accompanying Memorandum in Support, the Court should grant the Motion.

November 6, 2015

Respectfully submitted,

/s/ Jeremy D. Engle

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CERTIFICATE OF SERVICE

I hereby certify that on November 6, 2015, I electronically filed a true and correct copy of the foregoing using the Court's CM/ECF system, which then sent a notification of such filing (NEF) to all counsel of record:

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